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*Lead Counsel for Lead Plaintiff
and the Proposed Settlement Class*

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

CHENG JIANGCHEN, Individually
and on Behalf of All Others Similarly
Situating,

Plaintiff,

vs.

RENTECH, INC., KEITH B.
FORMAN, and JEFFREY SPAIN,

Defendants.

Case No. 2:17-cv-01490-GW-FFM

**NOTICE OF LEAD PLAINTIFF'S
UNOPPOSED MOTION FOR (I)
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT,
(II) CERTIFICATION OF THE
SETTLEMENT CLASS, AND (III)
APPROVAL OF NOTICE TO THE
SETTLEMENT CLASS**

Date: June 24, 2019
Time: 8:30 a.m.
Crtm: 9D
Judge: Hon. George H. Wu

1 **TO THE CLERK OF THE COURT AND ALL PARTIES AND THEIR**
2 **ATTORNEYS OF RECORD:**

3 PLEASE TAKE NOTICE that on June 24, 2019 at 8:30 a.m., or as soon
4 thereafter as the Parties may be heard, in the Courtroom of the Honorable George H.
5 Wu Courtroom 9D located at the United States Courthouse, 350 West 1st Street, Los
6 Angeles, CA 90012, Lead Plaintiff Ichiro Ikuno (“Lead Plaintiff”) will, and hereby
7 does, move the Court for the entry of the Preliminary Approval Order, attached as
8 Exhibit A to the Stipulation and Agreement of Settlement filed herewith (the
9 “Stipulation”), which provides for:

- 10 1. Preliminary approval of the proposed Settlement;
- 11 2. Preliminary certification of a Settlement Class;
- 12 3. Approval of the form and method for giving notice, as set forth in the
13 Stipulation; and
- 14 4. Setting the date for a hearing (the “Settlement Hearing”) to determine:
15 (i) whether the proposed Settlement provided for in the Stipulation is fair,
16 reasonable, and adequate to the Settlement Class and should be finally approved by
17 the Court; (ii) finally certifying the Settlement Class; (iii) Lead Counsel’s
18 application for an award of attorneys’ fees and expenses; and (iv) Lead Plaintiff’s
19 application for an award of reimbursement for costs and expenses in litigating this
20 action.

21 This unopposed motion is based upon the accompanying Memorandum of
22 Points and Authorities, the Declaration of Ex Kano S. Sams II, all the documents
23 and exhibits in support thereof, as well as all the pleadings and papers on file in this
24 matter and any further evidence and argument as may be presented at the hearing.

25 Lead Counsel conferred with Defendants’ counsel with respect to this motion.
26 Defendants’ counsel have authorized Lead Counsel to represent that Defendants do
27 not oppose this motion.
28

1 DATED: May 23, 2019

GLANCY PRONGAY & MURRAY LLP

2
3 By: /s/ Ex Kano S. Sams II

4 EX KANO S. SAMS II (#192936)

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14 *Lead Counsel for Lead Plaintiff*

15 *and the Proposed Settlement Class*

PROOF OF SERVICE BY ELECTRONIC POSTING

I, the undersigned say:

I am not a party to the above case, and am over eighteen years old. On May 23, 2019, I served true and correct copies of the following document, by posting the document electronically to the ECF website of the United States District Court for the Central District of California, for receipt electronically by the parties listed on the Court's Service List.

I affirm under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on May 23, 2019, at Los Angeles, California.

s/ Ex Kano S. Sams II

Ex Kano S. Sams II